

217-782-2113

JOINT CONSTRUCTION AND OPERATING PERMIT

PERMITTEE

Robbins Resource Recovery Partners, L.P.
c/o Foster Wheeler Illinois, Inc.
Attn: Dave Consalvo, General Manager
13400 South Kedzie Avenue
Robbins, Illinois 60472

<u>Application No.:</u> 98120027	<u>I.D. No.:</u> 031270AAA
<u>Applicant's Designation:</u>	<u>Date Received:</u> December 10, 1998
<u>Subject:</u> Bottom Ash Discharge System Modification	
<u>Date Issued:</u> October 15, 1999	<u>Operating Permit Expiration</u>
	<u>Date:</u> October 14, 2004

Location: 13400 South Kedzie Avenue, Robbins

This Permit is hereby granted to the above-designated Permittee to CONSTRUCT and OPERATE emission source(s) and air pollution control equipment consisting of alterations to the bottom ash conveyance system including the addition of three vibrating conveyors (CR-243, CR-244 and CR-245), one belt conveyor (CR-246) and a bin enclosure with loading chute, as described in the above-referenced application. This Permit is granted based upon the findings, and subject to standard conditions attached hereto and the following condition(s):

FINDINGS

1. Description of Equipment

The application covers four new conveyers and a storage bin to allow transfer of bottom ash from the boiler building directly into trucks in the ash loadout building for shipment off site. The proposed system when installed will replace the original drag conveyor system and eliminate the current practice of routine handling bottom ash in bins and roll-off boxes for shipment off site.

2. Emissions

Potential dust emission from handling ash in the boiler building will continue to be controlled by the existing filter system (F-215). The new conveyors will be enclosed to prevent loss of bottom ash. Ash loadout will occur in the ash loadout building consistent with the original design of the facility.

CONDITIONS

1. Operation of the emission units included in this permit shall not begin until associated air pollution control measures are in place and operational.

2. Visible emissions to the atmosphere from the bottom ash conveying system (including conveyor transfer points) shall not exceed more than 9 minutes in any 3-hour period except as provided in 40 CFR 60.55b(b) and (c), with compliance determined in accordance with 40 CFR 60.58b(k).
3. Ash shall only be transferred by the bottom ash conveying system when the conveyor enclosures and the filter system are functioning properly.
- 4a. Particulate matter emissions into the atmosphere from the filter system (F-215) shall not exceed a concentration 0.002 gr/dscf.
- b. The air pollution control system, including enclosures and the filter system shall, be operated and maintained in accordance with written procedures maintained on site, that incorporate good air pollution procedures to minimize emissions of particulate matter. At a minimum, these procedures shall address the manufacturer's recommendation for inspection and maintenance practices, a copy of which shall be kept at the facility.
- c. Dust collected by the primary filter shall be transferred to the flyash storage silo for subsequent disposal.
5. This permit is issued based on no increase in emissions from the facility due to the alterations to the bottom ash conveyance system. This is because the alterations including dust collective measures to control emissions are comparable to current measures.

- a.
 - i. The particulate matter emissions of the bottom ash system shall not exceed the following:

<u>Equipment</u>	<u>PM Emissions (Lb/Hr)</u>
Filter System (F-215)	0.041

Compliance with the above limitation shall be accomplished by maintaining the enclosures and the fabric filters in good operating condition.

- ii. Annual emissions from the bottom ash system shall not exceed 0.161 tons/yr.

Compliance with the above limitation shall be determined on a monthly basis, calculating annual particulate matter emissions as the product of the maximum hourly emission rate for a unit and the number of hours a unit operated in the preceding 12 months.

6. The Permittee shall provide the Illinois EPA written notice of the following:
 - a. Commencement of construction within 10 days.
 - b. Anticipated date of completion at least 10 days in advance.
 - c. Actual construction completion date, within 3 days.
- 7a. The Permittee shall conduct observations for visible emissions from the bottom ash system in accordance with 40 CFR 60.58b(k) under representative operating conditions with 30 days of initial startup of such system and within 10 days of written request from the Illinois EPA. Notwithstanding, if this system is not used during this period such observations shall be conducted the first time that the bottom ash system is used and repeated again for representative operating conditions if such conditions were not present for the first observations.
- b. At least 30 days prior to the actual date of observations, the Permittee shall submit a written test plan to the Illinois EPA for review and comment. This plan shall include as a minimum:
 - i. The names of the individuals who may be conducting observations and their experience with similar observations;
 - ii. The specific locations or points from which observations will be conducted; and
 - iii. The specific conditions under which observations will be conducted, including a discussion of why these conditions will be representative of the values of operating parameters for the emission unit, including associated control equipment, and the means by which the operating parameters will be determined.
- c. The Permittee shall provide the Illinois EPA with notice in advance of these observations to allow the Illinois EPA to witness the Permittee's observations and simultaneously conduct its own observations.
 - i. The Permittee shall provide the Illinois EPA with written notification at least 15 days prior to making observations to enable the Illinois EPA to have an observer present.
 - ii. If observations are delayed, the Permittee shall promptly notify the Illinois EPA by facsimile, at least 5 days prior to the scheduled date of observations or immediately, if the delay occurs in the 5 days prior to the scheduled date.

- d. The Permittee shall submit the Report for these observations, accompanied by a cover letter stating whether or not compliance was shown, to the Illinois EPA, within 10 days after the results are compiled, but no later than 30 days after the date of observations. The Report shall include as a minimum:
 - i. General information describing the observations, including the name and identification of the emission units which were observed, names of observers, and Illinois EPA witnesses;
 - ii. Summary of results;
 - iii. Description of observation procedures, including descriptions of observation points and observation schedule;
 - iv. Detailed description of test conditions, including:
 - A. Process information, i.e. mode(s) of operation and process rate; and
 - B. Control equipment information, i.e. operating parameters during observations.
 - v. Data and calculations, including copies of all raw data sheets.
- 8a. The Permittee shall keep an inspection, maintenance and repair log(s) for the air pollution control system. These logs shall include as a minimum:
 - i. Date of each inspection, maintenance and or repair activity;
 - ii. Significant findings of each inspection;
 - iii. Description of maintenance or repair activities if not routine preventative maintenance; and
 - iv. Probable cause for requiring maintenance or repair if not routine or preventative.
- b. The Permittee shall keep an operating log for the ash loadout that includes the following information as a minimum for each shipment of ash:
 - i. Date and time.
 - ii. Type of loadout, i.e., wet or dry.
 - iii. Identification of receiving vehicles.

- iv. Identity of individual overseeing ash loadout.
- v. Any unusual events during loadout, e.g. broken fittings, leaks, or interruption of filter control.
- vi. Replacement of filter cartridge(s).
- c. The Permittee shall keep records of the hours of operation of the in the bottom ash loadout system, which records shall be compiled on at least a monthly basis.
- d. The Permittee shall keep records of the particulate matter emissions from the ash loadout systems, with copies of supporting records and calculations.
- 9. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the data of entry and shall be made available for inspection and copying by the Illinois EPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
- 10. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to Illinois EPA within 30 days after the exceedance. The report shall include the emissions released in accordance with the description of the exceedance or violation and efforts to reduce emissions and future occurrences.
- 11. Two copies of required reports and notifications concerning equipment operation or repairs, performance testing or continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Eisenhower Tower
1701 South First Avenue
Maywood, Illinois 60153

Page 6

If you have an question on this permit, please call Jim Cobb at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:JDC:jar

cc: Region 1